

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: : Chapter 13
RICHARD J. DeMARCO : Case No. 19-15745-AMC
Debtor :

OBJECTION OF THE COMMONWEALTH OF PENNSYLVANIA,
DEPARTMENT OF REVENUE TO CONFIRMATION OF
DEBTOR'S CHAPTER 13 PLAN

The Commonwealth of Pennsylvania, Department of Revenue, by and through its attorney, Attorney General Josh Shapiro, hereby objects to the confirmation of debtor's Chapter 13 plan, pursuant to 11 U.S.C. §1324, and in support thereof states the following:

1. The Commonwealth of Pennsylvania, Department of Revenue is a priority creditor of the debtor in the amount of \$19,830.03 for unpaid personal income taxes.
2. The Commonwealth of Pennsylvania, Department of Revenue is a general unsecured creditor of the debtor in the amount of \$2,296.00 for unpaid personal income taxes.
3. Debtor's proposed Chapter 13 plan is objectionable.
4. Debtor's plan fails to provide for the payment in full of the Commonwealth of Pennsylvania, Department of Revenue's priority claim.

WHEREFORE, the Commonwealth of Pennsylvania, Department of Revenue prays that this Court enter an order denying confirmation of debtor's Chapter 13 plan.

Respectfully submitted,

JOSH SHAPIRO
ATTORNEY GENERAL

DATED: December 9, 2019

BY: /s/ Denise A. Kuhn

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